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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

ALICIA INES MOYA GARAY, JUAN  
JAIME LOPEZ-JIMENEZ, and ARRIBA  
LAS VEGAS WORKER CENTER,

Plaintiffs,

vs.

CITY OF LAS VEGAS, et al.,

Defendants.

Case No.: 2:20-cv-00119-ART-EJY

**ORDER GRANTING**

**STIPULATION FOR EXTENSION  
OF TIME**

**(FIRST REQUEST)**

Motion Filed: July 31, 2023  
Current Response Date: August 14, 2023  
New Response Date: September 11,  
2023 New Reply Date: October 16, 2023

**STIPULATION**

Plaintiffs Alicia Ines Moya Garay, Juan Jaime Lopez-Jimenez, and Arriba Las Vegas Worker Center (“Plaintiffs”) and Defendants United States Immigration and Customs Enforcement (“ICE”), Tae D. Johnson, and Michael Bernacke (“Federal Defendants”), by and through their respective counsel of record, hereby stipulate as follows:

On March 7, 2023, the Court entered an order finding that ICE is a required party under Rule 19 of the Federal Rules of Civil Procedure, and ordered Plaintiffs to name ICE as a defendant in this action and serve them within 90 days (Dkt. No. 96);

On May 23, 2023, Plaintiffs filed a Third Amended Complaint (Dkt. No. 98);

On July 31, 2023, Federal Defendants filed a Motion to Dismiss Plaintiffs’ Third Amended Complaint (Dkt. No. 114), with a response date of August 14, 2023;

The Parties have conferred and agreed to a 28-day extension of Plaintiffs’ deadline to respond to the Motion to Dismiss from August 14, 2023, to September 11, 2023, to allow counsel for Plaintiffs sufficient time to prepare such response;

Plaintiffs’ counsel has four scheduled depositions and interstate travel prior to August 14, 2023, and post-trial motions in another matter;

The Parties have conferred and agreed to a 28-day extension of Federal Defendants’ deadline to file a reply to Plaintiffs’ response from September 18, 2023 (seven days – pursuant to LR 7-2(b) – after Plaintiffs’ new deadline), to October 16, 2023;

The filer of this document attests that the concurrence in the filing of this document has been obtained from counsel for Federal Defendants under LR IC 5-1(d);

No trial date has been set for this action, the extension requested is not intended for purposes of delay, and no party will be prejudiced by the extension requested;

This is the first request for extension of time in this matter;

The Parties respectfully request that, for good cause show, the Court enter an order extending Plaintiffs’ deadline to respond to the Motion to Dismiss by twenty-eight (28) days

1 through September 11, 2023, and extending Federal Defendants' deadline to file a reply by twenty-  
2 eight (28) days through October 16, 2023;

3 The Parties stipulate and agree, through their undersigned counsel, subject to the Court's  
4 approval, that Plaintiffs will have until September 11, 2023, to file their response to the Motion to  
5 Dismiss, and that Federal Defendants will have until October 16, 2023 to file their reply to such  
6 response.

7 Respectfully submitted,  
8

9 Dated: August 4, 2023

**MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND**

*/s/ Luis L. Lozada*

Luis L. Lozada  
Ernest Herrera  
Leticia M. Saucedo  
MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

F. Travis Buchanan  
THE COCHRAN LAW FIRM

*Attorneys for Plaintiffs*

18  
19 Dated: August 4, 2023

**U.S. DEPARTMENT OF JUSTICE**

*/s/ J. Max Weintraub*

Brian M. Boynton  
William C. Peachey  
Kathleen A. Connolly  
John J.W. Inkeles  
J. Max Weintraub  
U.S. DEPARTMENT OF JUSTICE  
CIVIL DIVISION

*Attorneys for Federal Defendants*

IT IS SO ORDERED:



Anne R. Traum  
United States District Court Judge

DATED: August 4, 2023